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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO SEVENTY-NINTH
THROUGH EIGHTY-SEVENTH OMNIBUS
OBJECTIONS TO CLAIMS AND REQUEST
FOR ORDERS BY DEFAULT AS TO
UNOPPOSED OBJECTIONS**

[Re: Dkt. Nos. 10673, 10676, 10679, 10682,
10685, 10688, 10691, 10694, and 10697]

**Regarding Objections Set for Hearing
June 30, 2021, at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule
5 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District
6 of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter orders by default on the following omnibus claims
9 objections (collectively, the “**Omnibus Objections**”):

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Docket Number	Omnibus Objection
10673	<i>Reorganized Debtors’ Seventy-Ninth Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Seventy-Ninth Omnibus Objection ”)
10676	<i>Reorganized Debtors’ Eightieth Omnibus Objection to Claims (Satisfied Claims)</i> (the “ Eightieth Omnibus Objection ”)
10679	<i>Reorganized Debtors’ Eighty-First Omnibus Objection to Claims (No Liability Claims)</i> (the “ Eighty-First Omnibus Objection ”)
10682	<i>Reorganized Debtors’ Eighty-Second Omnibus Objection to Claims (Customer No Liability Claims)</i> (the “ Eighty-Second Omnibus Objection ”)
10685	<i>Reorganized Debtors’ Eighty-Third Omnibus Objection to Claims (Customer No Liability / Passthrough Claims)</i> (the “ Eighty-Third Omnibus Objection ”)
10688	<i>Reorganized Debtors’ Eighty-Fourth Omnibus Objection to Claims (Third-Party No Liability Claims)</i> (the “ Eighty-Fourth Omnibus Objection ”)
10691	<i>Reorganized Debtors’ Eighty-Fifth Omnibus Objection to Claims (ADR No Liability Claims)</i> (the “ Eighty-Fifth Omnibus Objection ”)
10694	<i>Reorganized Debtors’ Eighty-Sixth Omnibus Objection to Claims (Untimely Claims)</i> (the “ Eighty-Sixth Omnibus Objection ”)
10697	<i>Reorganized Debtors’ Eighty-Seventh Omnibus Objection to Claims (Plan Passthrough Proofs of Claim)</i> (the “ Eighty-Seventh Omnibus Objection ”)

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25 **RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS**

26 The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced
27 amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 10675, 10678, 10681, 10684, 10687, 10690, 10693, 10696, and 10699]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 10674, 10677, 10680, 10683, 10686, 10692, 10695, and 10698] and Renee Records [Docket No. 10689]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on May 26, 2021 [Docket No. 10717], each holder of a claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Seventy-Ninth Omnibus Objection			
Informal	Addington, David	3093	This matter is going forward as a status conference at the June 30, 2021, Omnibus Hearing. The Reorganized Debtors will file a status conference statement prior to the hearing.
Informal	Finley, Robert	87149	The Reorganized Debtors are attempting to resolve this matter consensually. This matter has been continued indefinitely and will be re-set for hearing if necessary.
Informal	Jabbari, Fereshteh	7154	This matter is going forward contested at the June 30, 2021, Omnibus Hearing. The Reorganized Debtors will file a reply requesting the Court disallow and expunge the claim at the hearing.

Docket No.	Claimant	Claim No.	Resolution
Informal	Marsh Landing, LLC	2026 74870	This matter has been continued to the July 28, 2021, Omnibus Hearing.
Informal	Marshall, Denise	106945	The Seventy-Ninth Omnibus Objection is SUSTAINED with respect to this claim.
Eightieth Omnibus Objection			
Informal	Sierra Pacific (SPI)	897079	The Eightieth Omnibus Objection is SUSTAINED with respect to this claim.
Eighty-First Omnibus Objection			
Informal	Xoom, Inc.	75972	A settlement has been reached with the Claimant. The Reorganized Debtors request that this matter be taken off calendar pending final resolution.
Eighty-Third Omnibus Objection			
Informal	Rai, Harmandeep	6579	The Eighty-Third Omnibus Objection is SUSTAINED with respect to this claim.
Eighty-Fourth Omnibus Objection			
10784	Nationwide Agribusiness	79284	This Objection has been WITHDRAWN and the Reorganized Debtors will attempt to resolve this Claim together with certain companion claims.
Eighty-Fifth Omnibus Objection			
Informal	Baker, Brenda	2261	A settlement has been reached with the Claimant. The Reorganized Debtors request that this matter be taken off calendar pending final resolution.
Informal	Pedroia, Sandra	87136	This matter is going forward contested at the June 30, 2021, Omnibus Hearing. The Reorganized Debtors will file a reply requesting the Court disallow and expunge the claim at the hearing.

Docket No.	Claimant	Claim No.	Resolution
Informal	Union Carbide	78621	This Objection has been WITHDRAWN and this Claim has been objected to in the <i>Ninety-Fifth Omnibus Objection to Claims (Plan Passthrough Claims)</i> pursuant to discussion with counsel for Claimant.
Eighty-Sixth Omnibus Objection			
Informal	City of San Jose	106186	This matter has been continued to the July 28, 2021, Omnibus Hearing.
Informal	Martin, James	106728	This Objection has been WITHDRAWN. The Debtors reserve the right object to this Claim in a future Omnibus Objection on separate grounds.
Eighty-Seventh Omnibus Objection			
Informal	International Brotherhood of Electrical Workers, Local Union No. 1245 (IBEW)	57750	The Eighty-Seventh Omnibus Objection is SUSTAINED with respect to this claim.
10773	Swendsen, Mark	93659	This matter is going forward contested at the June 30, 2021, Omnibus Hearing. The Reorganized Debtors will file a reply requesting the Court expunge the claim at the hearing.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors
2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.
3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (1) disallowing and/or expunging the Proofs of Claims listed in **Exhibit 1** to this Request and (2) allowing in the specified

1 “Reduced Claim Amount” the Claims listed in **Exhibit 1** to this Request, which listed Claims are
2 identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

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4 Dated: June 23, 2021

KELLER BENVENUTTI KIM LLP

5 By: /s/ Thomas B. Rupp
6 Thomas B. Rupp

7 *Attorneys for Debtors and Reorganized Debtors*
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